

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DEUTSCHE BANK TRUST COMPANY :  
AMERICAS, in its capacity as successor indenture :  
trustee for certain series of Senior Notes, *et al.*, :

Plaintiffs, :

vs. :

ADALY OPPORTUNITY FUND TD :  
SECURITIES INC. C/O ADALY INVESTMENT :  
MANAGEMENT CO., *et al.*, :

Defendants. :

Civil Action No.:  
1:11-CV-4784 (RJH)

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**CORPORATE DISCLOSURE STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned counsel for *General Motors Hourly-Rate Employee Pension Trust* (“**GMHREP Trust**”) (improperly named as GMIMCO Trust (General Motors) in the Amended Complaint filed by the above-captioned Plaintiffs), states as follows:

1. GMHREP Trust does not have any parent corporation and no publicly held corporation owns 10% or more of the stock of GMHREP Trust.

2. General Motors LLC is the sponsor of the General Motors Pension Plan for Hourly Employees.

Dated: October 17, 2011  
New York, New York

KING & SPALDING LLP

By /s/ Arthur Steinberg

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